



3. Pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), Ever's response to the Complaint is currently due in this Court on March 8, 2017.

4. Counsel for Ever has conferred with counsel for Plaintiff, who has no objection to allowing Ever until and including March 31, 2017 by which time to answer or otherwise plead in response to the Complaint.

5. This is Ever's first request for an extension of time to respond to the Complaint.

6. The reason for this request is that the parties are currently engaged in discussions regarding Plaintiff's allegations, as addressed in Ever's corporate declaration attached to its Notice of Removal [ECF # 1-4], and Ever believes that the brief extension requested will facilitate those discussions. This motion is being filed for good cause, and not for any dilatory or improper purpose.

WHEREFORE, Ever respectfully moves this Court for an extension until and including March 31, 2017 by which to answer or otherwise plead in response to the Complaint.

Dated: March 3, 2017

Respectfully submitted,

/s/ John C. Gekas

One of the Attorneys for Defendant

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*Attorneys for Defendant Everalbum, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 3rd day of March 2017, I filed a copy of the foregoing **Unopposed Motion to Extend Date for Defendant to Answer or Otherwise Plead in Response to Complaint** via the Court's CM/ECF system, thereby causing it to be served upon all counsel of record for Plaintiff.

/s/John C. Gekas

John C. Gekas